

FILED
MAY 3 2011
Phil Lombardi, Clerk
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

) Case No. 11 CR 61 GKF

Plaintiff,

) INDICTMENT

v.

KEITH GEORGE STRIMPLE,

Defendant.

) [COUNT 1: 18 U.S.C. § 2252(a)(4)(A):
Knowing and Attempted Possession of
Visual Depictions of Minors Engaging
in Sexually Explicit Conduct;
18 U.S.C. § 3261(a)(1) - Criminal
Offense Committed by Person
Employed by the Armed Forces
Outside the United States;
COUNT 2: 18 U.S.C. § 2252(a)(4)(B) -
Knowing and Attempted Possession of
Visual Depictions of Minors Engaging
in Sexually Explicit Conduct
18 U.S.C. § 3261(a)(1) - Criminal
Offense Committed by Person
Employed by the Armed Forces
Outside the United States]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §§ 2252(a)(4)(A), 3261(a)(1)]

Between on or about April 27, 2007, and on or about September 19, 2007, at Camp Fallujah, Iraq, the defendant, KEITH GEORGE STRIMPLE, a citizen of the United States with last known residence within the Northern District of Oklahoma, while employed by the Armed Forces outside of the United States, as that term is defined in Title 18, United States Code, Section 3267, did engage in conduct outside of the United States that would constitute an offense punishable by imprisonment for more than 1 year if the conduct had been engaged in within the special maritime and territorial jurisdiction of the United States, that is: did

knowingly attempt to possess one or more matters which contained any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2)(A)(i-v), and which visual depiction was of such sexually explicit conduct, in violation of Title 18, United States Code, Sections 2252(a)(4)(A) and 3261(a)(1).

COUNT TWO
[18 U.S.C. §§ 2252(a)(4)(B), 3261(a)(1)]

Between on or about April 27, 2007, and on or about September 19, 2007, at Camp Fallujah, Iraq, the defendant, **KEITH GEORGE STRIMPLE**, a citizen of the United States with last known residence within the Northern District of Oklahoma, while employed by the Armed Forces outside of the United States, as that term is defined in Title 18, United States Code, Section 3267, did engage in conduct outside of the United States that would constitute an offense punishable by imprisonment for more than 1 year if the conduct had been engaged in within the special maritime and territorial jurisdiction of the United States, that is: did knowingly attempt to possess one or more matters which contained any visual depiction that had been mailed, shipped and transported in interstate and foreign commerce, and which was produced using materials which had been mailed, shipped and transported in interstate and foreign commerce, by any means including by computer, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct, as that term is

defined in Title 18, United States Code, Section 2256(2)(A)(i-v), and which visual depiction was of such sexually explicit conduct, in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 3261(a)(1).

THOMAS SCOTT WOODWARD
UNITED STATES ATTORNEY

A TRUE BILL


MATTHEW P. CYRAN
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson


KEITH BECKER
Trial Attorney
Child Exploitation and Obscenity Section
Criminal Division, U.S. Department of Justice